

Buchanan Ingersoll & Rooney PC

John F. Povilaitis
717 237 4825
john.povilaitis@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852

September 6, 2019

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RECEIVED
2019 SEP - 6 PM 3:29
PA PUC
SECRETARY'S BUREAU
FRONT DESK

Re: Hudson Energy Services LLC, Docket No. A-2010-2192137
Utility Code: 11125438

Dear Secretary Chiavetta:

Enclosed is the Compliance Filing of Hudson Energy Services LLC ("Hudson"), a licensed energy generation supplier ("EGS"), to obtain renewal of its reduced 5% security requirement. This is a renewal of Hudson's previously granted security reduction; therefore no filing fee is enclosed.

The Compliance Filing includes commercially valuable and sensitive information for which Hudson requests confidential treatment. Accordingly, enclosed is a version of the Compliance Filing marked "Public Version" for inclusion in the public record, and a version of the Compliance Filing marked "Confidential Version." **Hudson respectfully requests that the Confidential Version of its Compliance Filing be maintained by the Pennsylvania Public Utility Commission under seal.**

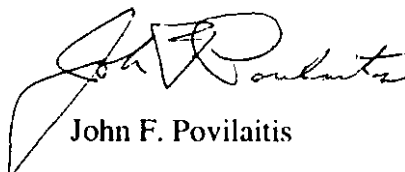
Copies of the Public Version of Hudson's Compliance Filing have been served on each of the statutory parties, the Commission's Bureau of Technical Utility Services, the Commonwealth of Pennsylvania's Department of Revenue, the Office of Attorney General's Bureau of Consumer Protection and all affected Pennsylvania electric distribution companies, as indicated in the attached Certificate of Service.

September 6, 2019

Page - 2 -

Please contact the undersigned if you have any questions regarding this filing. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "John F. Povilaitis", written in a cursive style.

John F. Povilaitis

Enclosures

cc: Certificate of Service

RECEIVED

SEP - 6 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

PUBLIC VERSION

SEP - 6 2019

**COMPLIANCE FILING TO MAINTAIN
PaPUC 5% SECURITY REQUIREMENT**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Hudson Energy Services LLC

Bonding/Security Requirement Filing for Continuation of Reduced Security

1. Hudson Energy Services LLC ("Hudson" or "Company") is a licensed electric generation supplier ("EGS") in the Commonwealth of Pennsylvania. Hudson's Application Docket No. is A-2010-2192137 and its Utility Code is 11125438. Hudson's contact person is Kristina Montgomery, Manager, Regulatory Affairs & Government Relations, 5251 Westheimer Road, Suite 1000, Houston, Texas 77056, kmontgomery@justenergy.com, 717-418-6508.

2. Hudson has been a licensed EGS since February 11, 2011 and has maintained its license in good standing since that time.

3. Hudson is compliant with its current bonding requirements. Hudson's most recent security reduction renewal was approved by Secretarial Letter dated October 29, 2018 at Docket No. A-2010-2192137. The Company's security expiration anniversary date is December 9, 2019.

4. By Final Order entered July 24, 2014, the Pennsylvania Public Utility Commission ("Commission") held that an EGS, following its first year of operations, may petition to have its bonding requirement reduced from 10% to 5% of the EGS's last 12 months of gross receipts or \$250,000, whichever is greater. *Public Utility Commission Bonding/Security Requirements for Electric Generation Suppliers: Acceptable Security Instruments*, Docket No. M-2013-2393141 (Order entered July 24, 2014). By Order of September 20, 2018, the Commission ended its requirement that EGSs petition for a reduction of its bonding requirements from 10% to 5% of gross receipts and authorized compliance filings to obtain renewals of security reductions. *Petition of the Retail Energy Supply Association to Simplify the Financial Security 5% Renewal Process*, Docket No. P-2017-2608078 (Order entered September 20, 2018).

5. The current financial security in place for Hudson expires on December 9, 2019.

6. Hudson's most recent 12 months of gross receipts and the 5% calculation on this total amount are provided in Confidential Attachment A.

7. Confidential Attachment B is Hudson's Pennsylvania Department of Revenue Tax Status Letter of Good Standing.¹

8. Confidential Attachment C is Hudson's confirmation AEC requirements have been met

9. Confidential Attachment D is Hudson's Pennsylvania Department of Revenue REV-423 Corporation Specialty Tax Estimated Payment Form.

¹ This document has been requested from the Department of Revenue and will be filed upon receipt of issuance.

10. Confidential Attachment E is a continuation certificate of the Company's current financial instrument in the amount of 5% of Hudson's gross receipts, effective until December 9, 2020.²

² The financial instrument will be submitted to the Commission upon receipt.

Confidential Attachment A

12 months of gross receipts and calculation of 5% security amount

(Redacted)

RECEIVED

SEP - 6 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Confidential Attachment B
Letter of Good Standing

(Redacted)

RECEIVED

SEP - 6 2019

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Confidential Attachment C

AEC Requirements

(Redacted)

Confidential Attachment D

REV-423 Corporation Specialty Tax Estimated Payment Form

(Redacted)

Confidential Attachment E

Continuation Certificate

(Redacted)

VERIFICATION

I, Kristina Montgomery, Manager, Regulatory Affairs, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Kristina Montgomery

Dated: September 6, 2019

RECEIVED

SEP - 6 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Hudson Energy Services LLC : Docket No. A-2010-2192137
Utility Code: 1125438 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the **public version** of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via First Class Mail

Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
PO Box 3265
Harrisburg, PA 17105-3265

Office of Attorney General
Bureau of Consumer Protection
15th Floor, Strawberry Square
Harrisburg, PA 17120

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101

Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
Harrisburg, PA 17105

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
PO Box 280947
Harrisburg, PA 17128

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 5219

Legal Department
First Energy
2800 Pottsville Pike
Reading, PA 19612

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P.O. Box 138
Wellsboro, PA 16901

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SEP - 6 2019

RECEIVED

PUBLIC VERSION

Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

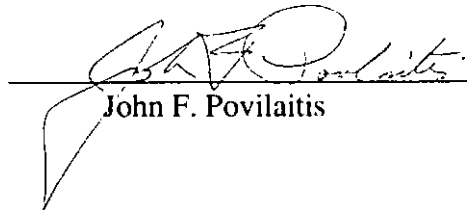
Office of General Counsel
Attn: Kimberly Klock
PPL
Two North Ninth Street
Allentown, PA 18108-1179

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
P.O. Box 12677
Reading, PA 19612-2677

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Vice President – Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Dated this 6th day of September, 2019.



John F. Povilaitis

RECEIVED

2019 SEP - 6 PM 3:29

PA PUC
SECRETARY'S BUREAU
REPORT DESK